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May 17, 2023

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The Honorable Ann Marie Donio, U.S.M.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: Eric D. Blanding vs. Borough of Woodlynne, et als.
No.: 1:20-cv-20481-RBK-AMD

Dear Judge Donio:

As you are aware, this office represents the Plaintiff with regard to the above-captioned matter.

Kindly allow this correspondence to serve as a reply to Mr. Riso's recent letter.

As the Court is aware, the instant case revolves around whether proper police procedures were utilized, including reasonable force, on the date of the subject incident, when Mr. Blanding was caused to sustain serious, severe and permanent physical injuries as a result of the conduct of the defendant (s).

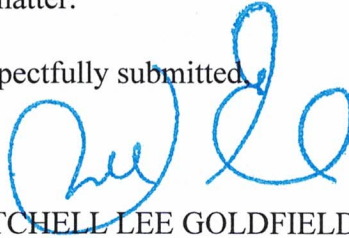
In response to Mr. Riso's requests, I had named Officer Maurice Lewis of the Winslow Township Police Department as Plaintiff's liability expert. (See a copy of our March 29, 2023 letter attached hereto).

Thereafter, in response to yet another request by Mr. Riso, I had advised him that based upon the subject matter of this case, I expect Officer Lewis' opinions to be based upon the deposition testimony of the defendants and the facts of the case as to whether the defendant(s) used proper police procedure, including reasonable force on the date of the subject incident. (See a copy of our April 25, 2023 email attached hereto).

Your Honor, at this stage of the proceedings, I am uncertain as to how I can be any more forthcoming in light of Mr. Riso's request.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'MLG', is written over the text 'Respectfully submitted,'.

MITCHELL LEE GOLDFIELD

MLG/nt

Enclosures

Cc: Eric Riso, Esq.